

Douglas J. Pick, Esq.  
Eric C. Zabicki, Esq.  
**PICK & ZABICKI LLP**  
Proposed Counsel to the Debtor  
369 Lexington Avenue, 12<sup>th</sup> Floor  
New York, New York 10017  
(212) 695-6000

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In re:  
NEW 97 CLEANERS, INC.,

Chapter 11  
Case No. 10-14151(AJG)

Debtor.

-----X

**SUPPLEMENTAL DISCLOSURE AFFIDAVIT IN CONNECTION WITH  
DEBTOR'S APPLICATION TO RETAIN PICK & ZABICKI LLP AS ITS COUNSEL**

STATE OF NEW YORK     )  
                                  )     ss.:  
COUNTY OF NEW YORK    )

DOUGLAS J. PICK, being duly sworn, deposes and says:

1.     I am a member of the law firm Pick & Zabicki LLP ("P&Z"), which maintains offices for the practice of law at 369 Lexington Avenue, 12<sup>th</sup> Floor, New York, New York 10017. I am personally familiar with the facts and circumstances recited herein.

2.     I submit this affidavit so as to supplement the disclosures set forth in connection with the application of New 97 Cleaners, Inc., the debtor and debtor-in-possession herein (the "Debtor"), for authority to retain P&Z as its counsel. Specifically, P&Z wishes to disclose its proposed representation of certain related parties and to more fully describe the relationship between said parties.

3.     The Debtor had pledged its capital stock and assets as collateral for the repayment of certain amounts owed to Ki Duk Kwak under two secured promissory notes (together,

the “Notes”). Specifically, the Notes were executed in or about February, 2009 by Young Ae Lee and Chung Hyuk Ahn in connection with the acquisition of the operations of Eastern Farms, Inc., d/b/a Delmonico Gourmet Food Market (“Eastern Farms”). The amounts owed under the Notes are secured by a second priority lien against substantially all of the assets and capital stock of Eastern Farms and liens of varying priority against the assets and capital stock of the Debtor and two other affiliated entities, For You Cleaners, Inc. and Lee’s Seoul Cleaners, Inc., under certain written guarantees and security agreements.<sup>1</sup> Eastern Farms, and not Young Ae Lee and Chung Hyuk Ahn, had made the payments owed under the Notes. The Debtor filed its chapter 11 petition because Eastern Farms did not have the financial wherewithal to make certain payments to Ki Duk Kwak which were coming due under the Notes.

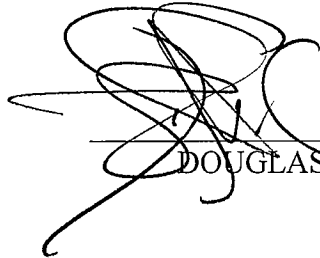
4. In addition to its proposed retention as counsel to the Debtor, Eastern Farms (Case No. 10-14150 (AJG)), For You Cleaners, Inc. (Case No. 10-14153 (AJG)) and Lee’s Seoul Cleaners, Inc. (Case No. 10-14156 (AJG)), have similarly sought to retain P&Z in connection with their respective chapter 11 cases pending before this Court.

5. P&Z has been advised by the Debtor that, other than the above-described inter-company guarantees, there are no claims between and among the Debtor, Eastern Farms., Lee’s Seoul Cleaners, Inc. and/or For You Cleaners, Inc. As of the date hereof, no formal claims under or efforts to enforce said guarantees have been made by Ki Duk Kwak. Accordingly, P&Z does not believe that its simultaneous representation of the aforementioned parties evidences any adverse


---

<sup>1</sup> Chung Hyuk Ahn is the President and sole shareholder of the Debtor. Mr. Ahn is also an officer of Eastern Farms, For You Cleaners, Inc. and Lee’s Seoul Cleaners, Inc. Young Ae Lee, is the sole shareholder and is an officer of Eastern Farms, For You Cleaners, Inc. and Lee’s Seoul Cleaners, Inc. Ms. Lee is also an officer of the Debtor.

interest, present any disqualifying actual, perceived or potential conflict of interest or alter P&Z's asserted status as a disinterested person. In the event that any potential issues or objections arise with regard to which an evaluation of the merits of the guarantees would be necessary or appropriate, P&Z agrees to immediately notify the Office of the United States Trustee.

  
\_\_\_\_\_  
DOUGLAS J. PICK

Sworn to before me this  
30<sup>th</sup> day of August, 2010



\_\_\_\_\_  
Eric C. Zabicki  
Notary Public, State of New York  
No. 02ZA6078736  
Qualified in New York County  
Commission Expires August 5, 2014